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July 11, 2023

BY ECF:

The Honorable Lewis J. Liman
United States District Judge

Re: *Keawsrei, et al, v. Ramen-ya, Inc., et al.*, 17 CV 2406 (LJL)

Dear Judge Liman:

I write to the Court seeking confirmation/clarification of the matters pending before the Court. I further write to modify one deadline for motion papers due July 12, 2023.

I begin by stating the obvious that this office sympathizes with the plaintiffs and their attorneys' goal to collect on the judgment. No one has intentionally obstructed that process.

Motion for Criminal Contempt:

At the last conference, Your Honor gave me and Ms. Maki's CJA counsel until July 12 to file opposition papers. Once the motion is fully briefed then the Court would entertain that and consider whether a referral for criminal charges is appropriate. If I am mistaken, please clarify this issue.

Alter-ego/fraudulent conveyance:

The continued hearing on this issue and Ms. Maki and the CPA's testimony is scheduled for July 17. My presence is not mandated but I still plan to appear on that date.

Appointment of Receiver etc.:

The deadline for these opposition papers is July 17. This motion is not fully briefed and the Court would be scheduling a hearing date for this particular issue. Once again, If I am incorrect in my understanding, please let me know.

Criminal Contempt Motion:

On July 6, this Court denied the Negitas' application for CJA counsel and suggested they retain one on their own by making an application to NJ Bankruptcy court ("BK court"). Mrs. Negita has done so and made an application to the BK court yesterday. It is my understanding that the process takes anywhere from 7-10 business days. Mr. Negita is still looking for separate counsel. Understandably, no attorney would file an appearance in this case without assurance of payment for their services.

Insofar as the criminal contempt motion and the possible criminal referral are inextricably intertwined, I respectfully request that the Court *sua sponte* extend the opposition papers deadline from July 12 to a date the Court deems appropriate. It would only be fair to the Negitas to have separate legal conflict-free counsel address their respective defenses in their opposition papers which if not done properly could subject them to a criminal referral.¹

Thank you.

Respectfully,

/s

Vik Pawar (VP9101)

Cc: All counsel

¹ If the Court does not grant this extension, I respectfully request until Friday to file the papers due to a personal issue (I am the primary caretaker of my mother and I have to travel to NJ to bring her to a medical appointment tomorrow – Wednesday).